

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

KIRA WAHLSTROM,  
Plaintiff

v.

ZURICH AMERICAN INSURANCE COMPANY  
and AMERICAN GUARANTEE AND  
LIABILITY INSURANCE COMPANY

Defendants

NO. 1:19-cv-12208

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**PROPOSED JOINT SCHEDULING ORDER**

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Pursuant to Fed. R. Civ. P. 16, the parties hereby submit the following proposed joint scheduling order.

I. Timetable for Discovery and Motion Practice

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) and by this Court's Notice of Scheduling Conference must be completed by May 1, 2020.

2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after May 1, 2020.

3. **Fact Discovery – Interim Deadlines.**

a. All requests for production of documents and interrogatories must be served by June 1, 2020.

b. All requests for admission must be served by September 1, 2020.

c. All depositions, other than expert depositions, must be completed by November 2, 2020.

d. **Final Fact Discovery Deadline.** All discovery, other than expert discovery, must be completed by November 2, 2020.

4. **Status Conference.** To be held on January 15, 2021 or at the Court's discretion.

5. **Expert Discovery.**

a. Trial experts for the party with the burden of proof must be designated and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by January 2, 2021.

b. Rebuttal trial experts must be designated, and information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by February 3, 2021.

c. All trial experts must be deposed by February 28, 2021.

6. **Dispositive Motions.**

a. Dispositive motions, such as motion for summary judgment or partial summary judgment and motions for judgment on the pleadings must be filed by March 31, 2021 with the opposition due 30 days thereafter. In the case of cross-motions the deadlines and page limits for the filings other than the Plaintiff's initial motion are set forth in the Session's Standing Order on Summary Judgment Motions unless specifically modified.

7. **Initial Pretrial Conference.** To be held at the Court's discretion. The parties shall prepare and submit a pretrial memorandum in accordance with Local Rule 16.5(d) five business days prior to the date of the conference.

8. **Settlement.** The plaintiff has made a revised settlement demand, which the defendants have under consideration.

9. **Rule 16 Conference.** The parties recommend that the Court either cancel the Rule 16 Conference and adopt the parties' joint statement, or permit counsel to attend the Rule 16 Conference by telephone.

KIRA WAHLSTROM,  
By her Attorneys,

ZURICH AMERICAN INSURANCE  
COMPANY and AMERICAN GUARANTEE  
AND LIABILITY INSURANCE COMPANY  
By its Attorneys,

/s/ David J. Hoey

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**CERTIFICATE OF SERVICE**

I, Allen N. David, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be mailed by First Class Mail to those indicated as non-registered participants on this 24<sup>th</sup> day of March, 2020.

/s/ Allen N. David  
Allen N. David